

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JACKSONVILLE POLICE AND FIRE
PENSION FUND, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

AMERICAN INTERNATIONAL GROUP,
INC., MARTIN SULLIVAN, STEVEN
BENSINGER, JOSEPH CASSANO, and
ROBERT LEWIS,

Defendants.

)
) **CIVIL ACTION NO. 08-CV-4772-RJS**

)
) **ECF Filed**

JAMES CONNOLLY, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

AMERICAN INTERNATIONAL GROUP,
MARTIN J. SULLIVAN, STEVEN J.
BENSINGER, JOSEPH J. CASSANO,
ROBERT E. LEWIS, and DAVID L.
HERZOG,

Defendants.

)
) **CIVIL ACTION NO. 08-CV-5072-RJS**

(Caption continued on subsequent page)

**NOTICE OF MOTION OF ONTARIO TEACHERS' PENSION PLAN BOARD
AND PGGM FOR (1) APPOINTMENT AS LEAD PLAINTIFF; (2) APPROVAL
OF THEIR SELECTION OF COUNSEL AS LEAD COUNSEL FOR THE CLASS;
AND (3) CONSOLIDATION OF ALL RELATED ACTIONS**

MAINE PUBLIC EMPLOYEES
RETIREMENT SYSTEM, on behalf of itself
and all others similarly situated,

Plaintiff,

V.

AMERICAN INTERNATIONAL GROUP,
INC., MARTIN SULLIVAN, STEVEN
BENSINGER, JOSEPH CASSANO, and
ROBERT LEWIS,

Defendants.

CIVIL ACTION NO. 08-CV-5464-RJS

ONTARIO TEACHERS' PENSION PLAN
BOARD, on behalf of itself and all others
similarly situated,

Plaintiff,

V.

AMERICAN INTERNATIONAL GROUP,
INC., MARTIN SULLIVAN, STEVEN
BENSINGER, JOSEPH CASSANO, and
ROBERT LEWIS,

Defendants.

CIVIL ACTION NO. 08-CV-5560-RJS

PLEASE TAKE NOTICE that on a date and at a time designated by the Court, before the Honorable Richard J. Sullivan, at the United States District Court for the Southern District of New York, located at the United States Courthouse, 500 Pearl Street, Courtroom 21C, New York, New York, Ontario Teachers' Pension Plan Board ("Ontario Teachers") and Stichting Pensioenfonds Zorg en Welzijn, duly represented by PGGM Vermogensbeheer B.V. ("PGGM"), will respectfully move this Court, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 ("Exchange Act"), 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the "PSLRA"), for entry of an Order appointing Ontario Teachers and PGGM as Lead Plaintiff in the above-captioned actions, approving their choice of the law firms of Bernstein Litowitz Berger & Grossmann LLP ("BLB&G") and Schiffrin Barroway Topaz & Kessler, LLP ("SBTK") as Lead Counsel for the Class, and consolidating all related actions herewith under Rule 42(a) of the Federal Rules of Civil Procedure.

Ontario Teachers and PGGM intend to demonstrate that they have the largest financial interest in the relief sought by the Class and, thus, should be appointed Lead Plaintiff. Ontario Teachers and PGGM suffered approximately \$156 million in losses on their investment in AIG during the class period. Accordingly, Ontario Teachers and PGGM believe that they have the largest financial interest of any qualified movant seeking appointment as Lead Plaintiff.

The appointment of Ontario Teachers and PGGM as Lead Plaintiff would advance the primary goal of the PSLRA lead plaintiff provisions: to encourage institutional investors with large financial stakes in the outcome of the litigation to assume control over securities class actions. In addition, Ontario Teachers and PGGM

meet the requirements of Rule 23 of the Federal Rules of Civil Procedure because their claims are typical of other Class members' claims and because they will fairly and adequately represent the interests of the Class.

This motion is based upon this Notice of Motion, the accompanying Memorandum of Law in support thereof, the Declaration of Gerald H. Silk filed herewith, the pleadings and other files herein, and such other written or oral argument as may be permitted by the Court.

WHEREFORE, Ontario Teachers and PGGM respectfully request that the Court: (1) appoint Ontario Teachers and PGGM as Lead Plaintiff pursuant to the PSLRA; (2) approve Ontario Teachers' and PGGM's selection of Lead Counsel for the Class; (3) consolidate all related actions; and (4) grant such other and further relief as the Court may deem just and proper.

DATED: July 21, 2008
New York, New York

Respectfully submitted,

**BERNSTEIN LITOWITZ BERGER &
GROSSMANN LLP**

/s/ Gerald H. Silk
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Class*

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Welzijn, duly represented by PGGM
Vermogensbeheer B.V., and Proposed Lead
Counsel for the Class*